

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**IN RE: NATIONAL COLLEGIATE
ATHLETIC ASSOCIATION STUDENT-
ATHLETE CONCUSSION INJURY
LITIGATION-SINGLE SPORT/SINGLE
SCHOOL (FOOTBALL)**

Master Docket No. 16 CV 8727

MDL NO. 2492

Judge Manish S. Shah

This Document Relates Only to:

**Case No. 16 C 7320 (Hermann)
Case No. 16 C 9971 (Davison)
Case No. 16 C 7323 (Miller)
Case No. 17 C 7554 (Calleja)
Case No. 16 C 9992 (Bozeman)
Case No. 17 C 3960 (Williams)
Case No. 16 C 7324 (Owens)
Case No. 16 C 9974 (Ford)**

**RONALD W. HERMANN, II,
Plaintiff,**

v.

**SOUTHEASTERN CONFERENCE and THE
NATIONAL COLLEGIATE ATHLETIC
ASSOCIATION,
Defendant.**

**HENRY DAVISON,
Plaintiff,**

v.

**SOUTHEASTERN CONFERENCE and THE
NATIONAL COLLEGIATE ATHLETIC
ASSOCIATION,
Defendant.**

**JOSEPH MILLER,
Plaintiff,**

v.

**SOUTHEASTERN CONFERENCE and THE
NATIONAL COLLEGIATE ATHLETIC
ASSOCIATION,
Defendant.**

**KENNETH CALLEJA,
Plaintiff,**

v.

**THE NATIONAL COLLEGIATE
ATHLETIC ASSOCIATION and
SOUTHEASTERN CONFERENCE,
Defendant.**

JAMES BOZEMAN,
Plaintiff,

v.

SOUTHEASTERN CONFERENCE and THE
NATIONAL COLLEGIATE ATHLETIC
ASSOCIATION,
Defendant.

LESLEY WILLIAMS,
Plaintiff,

v.

SOUTHEASTERN CONFERENCE and THE
NATIONAL COLLEGIATE ATHLETIC
ASSOCIATION,
Defendant.

ORENTHAL JAMES OWENS,
Plaintiff,

v.

SOUTHEASTERN CONFERENCE and THE
NATIONAL COLLEGIATE ATHLETIC
ASSOCIATION,
Defendant.

DEMORIO FORD,
Plaintiff,

v.

SOUTHEASTERN CONFERENCE and THE
NATIONAL COLLEGIATE ATHLETIC
ASSOCIATION,
Defendant.

MOTIONS OF DEFENDANT
SOUTHEASTERN CONFERENCE TO DISMISS
PURSUANT TO FED. R. CIV. P. 12(b)(2)

Pursuant to Federal Rules of Civil Procedure 12(b)(2) and 54(b), and for the reasons set forth more fully in the supporting Memorandum of Law in Support of the SEC's Motion to

Dismiss being submitted herewith, Defendant Southeastern Conference (“SEC”) hereby moves (a) for entry of an order dismissing the SEC for lack of personal jurisdiction in each of the above-captioned actions pursuant to Fed. R. Civ. P. 12(b)(2), and (b) for entry of final judgment dismissing the SEC from each of the above-captioned actions, pursuant to Fed. R. Civ. P. 54(b).

WHEREFORE, the SEC respectfully requests that this Court dismiss the SEC for lack of personal jurisdiction and enter final judgment dismissing the SEC from the above-captioned actions pursuant to Fed. R. Civ. P. 54(b). The SEC further requests such other relief as the Court deems appropriate.

Dated: May 25, 2023

Respectfully submitted,

/s/ Robert W. Fuller

Robert W. Fuller, One of the Attorneys for
Defendant Southeastern Conference

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CERTIFICATE OF SERVICE

I, Robert W. Fuller, certify that on May 25, 2023, a true and correct copy of the foregoing document was filed through the CM/ECF system, which caused notice to be sent to all counsel of record.

/s/ Robert W. Fuller

Robert W. Fuller, One of the Attorneys for
Defendant Southeastern Conference

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